

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 3298



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2017 MAR 30 PM 3:36

SENSITIVE

March 30, 2017

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *WAP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *BH*
Reports Analysis Division *ll' for KDIR*
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2016 Year-End Report for the
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2016 Year-End Report in accordance with 52 U.S.C. § 30104(a). The Year-End Report was due on January 31, 2017.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report : no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

Recommendation

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2016 YEAR-END Not Election Sensitive 01/31/2017 H_S_P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3286	C00599944	ADRIAN GARCIA FOR CONGRESS	ADRIAN GARCIA	MONICA GARCIA	\$778,965	0		Not Filed	\$155,793 (est)	\$7,641
3287	C00623256	AMERICA COMES FIRST PAC		DAVID W. SCHAMENS	\$463,211	0		Not Filed	\$154,403 (est)	\$7,641
3288	C00597682	ANGEL ROSA COMISIONADO RESIDENTE	ANGEL ROSA	ELISAMUEL RIVERA	\$418,345	0		Not Filed	\$83,669 (est)	\$4,862
3289	C00556944	BRUCE DAVIS FOR US CONGRESS	BRUCE EDWARD DAVIS SR.	GLENDIA CLARK	\$166,677	0		Not Filed	\$16,667 (est)	\$654
3290	C00496927	CITIZENS SUPER PAC FOR AMERICA (CSPAC)		SIDDIQ MUMIN	\$232,710	1		Not Filed	\$46,542 (est)	\$1,470
3291	C00554253	CLAITOR FOR CONGRESS	DANIEL A. CLAITOR	CHELSEA BONNECAZE	\$120,518	6		Not Filed	\$120,518 (est)	\$15,630
3292	C00551465	COMMITTEE TO ELECT JD WINTEREGG	J.D. WINTEREGG	JOSEPH WINTEREGG	\$179,199	1		Not Filed	\$25,599 (est)	\$1,470
3293	C00614362	DAN COX FOR CONGRESS	DAN COX	DANIEL RAZVI	\$145,404	0	2/14/2017	14	\$2,091	\$117
3294	C00606970	EUGENE FOR CONGRESS	EUGENE YU	ERIC YU	\$110,841	0		Not Filed	\$36,946 (est)	\$1,176
3295	C00590943	FIORE FOR CONGRESS	MICHELE FIORE	ANDREA SCHULEIN	\$880,713	0		Not Filed	\$176,142 (est)	\$7,641
3296	C00404350	FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION		SHARLYN WOODY	\$151,145	0		Not Filed	\$21,592 (est)	\$654
3297	C00603654	FRIENDS OF MATT DETCH	MATTHEW PAUL DETCH	MICHAEL BEALE	\$110,005	0		Not Filed	\$36,668 (est)	\$1,176
3298	C00610808	FRIENDS OF PAM TUCKER	PAMELA Z. TUCKER	KENNETH G. BELLEVUE	\$200,831	0		Not Filed	\$66,943 (est)	\$3,751
3299	C00385740	FROZEN FOOD POLITICAL ACTION COMMITTEE		ALISON REICH BODOR	\$149,826	0		Not Filed	\$29,965 (est)	\$1,176
3300	C00576223	GALLAGHER FOR NEW YORK	MICHAEL GALLAGHER	MICHAEL GALLAGHER	\$182,614	0		Not Filed	\$26,087 (est)	\$1,176
3301	C00524363	GREAT LAKES SUPER POLITICAL ACTION COMMITTEE		DWIGHT WASHINGTON	\$157,500	0		Not Filed	\$31,500 (est)	\$1,176
3302	C00622555	JOHN CARROLL FOR US SENATE 2016	JOHN STANLEY CARROLL	WINONA KALAKAU-HATAYAMA	\$114,174	0		Not Filed	\$38,058 (est)	\$1,176
3303	C00607929	KHARY FOR CONGRESS	KHARY PENEBAKER	SUSAN HOTZ	\$159,865	0		Not Filed	\$31,973 (est)	\$1,176
3304	C00603563	LIBERTY ACTION GROUP		JOEY CAMMER	\$5,666,394	0	2/22/2017	22	\$218,816	\$6,735
3305	C00565598	MAXWELL FOR CONGRESS	CHIP MAXWELL	CHIP MAXWELL	\$225,686	0		Not Filed	\$32,240 (est)	\$1,176
3306	C00570564	PAMELA KEITH FOR SENATE 2016	PAMELA MICHELE KEITH	PAMELA KEITH	\$513,212	0		Not Filed	\$64,151 (est)	\$3,751
3307	C00612861	PELLERIN FOR US SENATE LLC	JOSHUA A. PELLERIN	JENNIFER MAY	\$348,588	0		Not Filed	\$69,717 (est)	\$3,751
3308	C00427203	PENINSULA DEMOCRATIC COALITION		ZACHERY ROSS	\$468,019	0	2/8/2017	8	\$5,441	\$113

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3309	C00192849	PLUMBERS AND PIPEFITTERS LOCAL UNION 74		MICHAEL B. HACKENDORN	\$293,983	4	2/13/2017	13	\$4,387	\$222
3310	C00620427	PRIDE FUND TO END GUN VIOLENCE PAC		JORDAN CROWDER	\$121,882	0	3/4/2017	Not Filed	\$13,225 (est)	\$654
3311	C00473538	RICH ASHOOH COMMITTEE	RICHARD E. ASHOOH	RICHARD J. MALONEY	\$637,088	0		Not Filed	\$79,636 (est)	\$4,862
3312	C00607762	SOULES FOR US CONGRESS	MERRIE LEE SOULES	MARYANN HENDRICKSON	\$799,501	0		Not Filed	\$133,250 (est)	\$6,252
3313	C00591875	SUE GOOGE FOR CONGRESS	SUE GOOGE	TRACY PAINTER PERINA	\$194,648	0		Not Filed	\$27,806 (est)	\$1,176
3314	C00362632	SWING STATES FOR A CONSERVATIVE WHITE HOUSE PAC INC		OFFICE OF TREASURER	\$134,449	1		Not Filed	\$44,816 (est)	\$1,470
3315	C00445163	TADDEO FOR CONGRESS	ANNETTE TADDEO	RALPH PATINO	\$3,486,757	0	2/17/2017	17	\$346,633	\$6,793
3316	C00581314	TAYLOR GRIFFIN FOR CONGRESS	WILLIAM TAYLOR GRIFFIN	TAYLOR GRIFFIN	\$717,525	0		Not Filed	\$119,587 (est)	\$6,252
3317	C00613216	THE CANDIDATE BILLY DAVIS INC.	BILLY DAVIS	BILLY DAVIS	\$146,000	1		Not Filed	\$73,000 (est)	\$4,688
3318	C00612846	THE DEMOCRATIC COALITION		FRANCESCA N. LUCIA	\$247,741	0		Not Filed	\$82,580 (est)	\$4,862

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2016)
Year-End Report for the Administrative)
Fine Program:)
ADRIAN GARCIA FOR CONGRESS, and) AF# 3286
GARCIA, MONICA as treasurer;)
AMERICA COMES FIRST PAC, and) AF# 3287
SCHAMENS, DAVID W MR. as treasurer;)
ANGEL ROSA COMISIONADO) AF# 3288
RESIDENTE, and RIVERA, ELISAMUEL)
as treasurer;)
BRUCE DAVIS FOR US CONGRESS, and) AF# 3289
CLARK, GLENDA as treasurer;)
CITIZENS SUPER PAC FOR AMERICA) AF# 3290
(CSPAC), and SIDDIQ MUMIN as)
treasurer;)
CLAITOR FOR CONGRESS, and) AF# 3291
CHELSEA BONNECAZE as treasurer;)
COMMITTEE TO ELECT JD) AF# 3292
WINTEREGG, and WINTEREGG,)
JOSEPH as treasurer;)
DAN COX FOR CONGRESS, and RAZVI,) AF# 3293
DANIEL as treasurer;)
EUGENE FOR CONGRESS, and YU,) AF# 3294
ERIC MR. as treasurer;)
FIORE FOR CONGRESS, and) AF# 3295
SCHULEIN, ANDREA as treasurer;)
FRESNO COUNTY DEMOCRATIC) AF# 3296
WOMEN'S CLUB/DEMOCRATS IN)
ACTION, and WOODY, SHARLYN MS as)
treasurer;)
FRIENDS OF MATT DETCH, and) AF# 3297
BEALE, MICHAEL as treasurer;)
FRIENDS OF PAM TUCKER, and) AF# 3298
KENNETH G BELLEVUE as treasurer;)

Federal Election Commission
Certification for Administrative Fines
April 03, 2017

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FROZEN FOOD POLITICAL ACTION COMMITTEE, and REICH BODOR, ALISON as treasurer; AF# 3299
GALLAGHER FOR NEW YORK, and GALLAGHER, MICHAEL as treasurer;) AF# 3300
GREAT LAKES SUPER POLITICAL ACTION COMMITTEE, and DWIGHT WASHINGTON as treasurer;) AF# 3301
JOHN CARROLL FOR US SENATE 2016, and WINONA KALAKAU-HATAYAMA as treasurer;) AF# 3302
KHARY FOR CONGRESS, and HOTZ, SUSAN as treasurer;) AF# 3303
LIBERTY ACTION GROUP, and CAMMER, JOEY as treasurer;) AF# 3304
MAXWELL FOR CONGRESS, and CHIP MAXWELL as treasurer;) AF# 3305
PAMELA KEITH FOR SENATE 2016, and PAMELA KEITH as treasurer;) AF# 3306
PELLERIN FOR US SENATE LLC, and JENNIFER MAY as treasurer;) AF# 3307
PENINSULA DEMOCRATIC COALITION, and ZACHERY ROSS as treasurer;) AF# 3308
PLUMBERS AND PIPEFITTERS LOCAL UNION 74, and HACKENDORN, MICHAEL B as treasurer;) AF# 3309
PRIDE FUND TO END GUN VIOLENCE PAC, and CROWDER, JORDAN as treasurer;) AF# 3310
RICH ASHOOH COMMITTEE, and MALONEY, RICHARD J. as treasurer;) AF# 3311
SOULES FOR US CONGRESS, and HENDRICKSON, MARYANN MS as treasurer;) AF# 3312
SUE GOOGE FOR CONGRESS, and TRACY PAINTER PERINA as treasurer;) AF# 3313
TADDEO FOR CONGRESS, and PATINO, RALPH as treasurer;) AF# 3315
TAYLOR GRIFFIN FOR CONGRESS, and GRIFFIN, TAYLOR as treasurer;) AF# 3316
THE CANDIDATE BILLY DAVIS INC., and DAVIS, BILLY as treasurer;) AF# 3317
THE DEMOCRATIC COALITION, and LUCIA, FRANCESCA N as treasurer;) AF# 3318

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 03, 2017 the Commission took the following actions on the Reason To Believe Recommendation - 2016 Year-End Report for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 30, 2017, on the following committees:

AF#3286 Decided by a vote of 4-0 to: (1) find reason to believe that ADRIAN GARCIA FOR CONGRESS, and GARCIA, MONICA in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3287 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3288 Decided by a vote of 4-0 to: (1) find reason to believe that ANGEL ROSA COMISIONADO RESIDENTE, and RIVERA, ELISAMUEL in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3289 Decided by a vote of 4-0 to: (1) find reason to believe that BRUCE DAVIS FOR US CONGRESS, and CLARK, GLENDA in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3290 Decided by a vote of 4-0 to: (1) find reason to believe that CITIZENS SUPER PAC FOR AMERICA (CSPAC), and SIDDIQ MUMIN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3291 Decided by a vote of 4-0 to: (1) find reason to believe that CLAITOR FOR CONGRESS, and CHELSEA BONNECAZE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3292 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT JD WINTEREGG, and WINTEREGG, JOSEPH in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3293 Decided by a vote of 4-0 to: (1) find reason to believe that DAN COX FOR CONGRESS, and RAZVI, DANIEL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3294 Decided by a vote of 4-0 to: (1) find reason to believe that EUGENE FOR CONGRESS, and YU, ERIC MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3295 Decided by a vote of 4-0 to: (1) find reason to believe that FIORE FOR CONGRESS, and SCHULEIN, ANDREA in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3296 Decided by a vote of 4-0 to: (1) find reason to believe that FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION, and WOODY, SHARLYN MS in her official capacity as treasurer violated 52 U.S.C.

30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3297 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF MATT DETCH, and BEALE, MICHAEL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3298 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF PAM TUCKER, and KENNETH G BELLEVUE in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3299 Decided by a vote of 4-0 to: (1) find reason to believe that FROZEN FOOD POLITICAL ACTION COMMITTEE, and REICH BODOR, ALISON in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3300 Decided by a vote of 4-0 to: (1) find reason to believe that GALLAGHER FOR NEW YORK, and GALLAGHER, MICHAEL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3301 Decided by a vote of 4-0 to: (1) find reason to believe that GREAT LAKES SUPER POLITICAL ACTION COMMITTEE, and DWIGHT WASHINGTON in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3302 Decided by a vote of 4-0 to: (1) find reason to believe that JOHN CARROLL FOR US SENATE 2016, and WINONA KALAKAU-HATAYAMA in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report;

(2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3303 Decided by a vote of 4-0 to: (1) find reason to believe that KHARY FOR CONGRESS, and HOTZ, SUSAN in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3304 Decided by a vote of 4-0 to: (1) find reason to believe that LIBERTY ACTION GROUP, and CAMMER, JOEY in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3305 Decided by a vote of 4-0 to: (1) find reason to believe that MAXWELL FOR CONGRESS, and CHIP MAXWELL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3306 Decided by a vote of 4-0 to: (1) find reason to believe that PAMELA KEITH FOR SENATE 2016, and PAMELA KEITH in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3307 Decided by a vote of 4-0 to: (1) find reason to believe that PELLERIN FOR US SENATE LLC, and JENNIFER MAY in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3308 Decided by a vote of 4-0 to: (1) find reason to believe that PENINSULA DEMOCRATIC COALITION, and ZACHERY ROSS in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3309 Decided by a vote of 4-0 to: (1) find reason to believe that PLUMBERS AND PIPEFITTERS LOCAL UNION 74, and HACKENDORN, MICHAEL B in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3310 Decided by a vote of 4-0 to: (1) find reason to believe that PRIDE FUND TO END GUN VIOLENCE PAC, and CROWDER, JORDAN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3311 Decided by a vote of 4-0 to: (1) find reason to believe that RICH ASHOOH COMMITTEE, and MALONEY, RICHARD J. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3312 Decided by a vote of 4-0 to: (1) find reason to believe that SOULES FOR US CONGRESS, and HENDRICKSON, MARYANN MS in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3313 Decided by a vote of 4-0 to: (1) find reason to believe that SUE GOOGE FOR CONGRESS, and TRACY PAINTER PERINA in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3315 Decided by a vote of 4-0 to: (1) find reason to believe that TADDEO FOR CONGRESS, and PATINO, RALPH in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3316 Decided by a vote of 4-0 to: (1) find reason to believe that TAYLOR GRIFFIN FOR CONGRESS, and GRIFFIN, TAYLOR in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil


money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3317 Decided by a vote of 4-0 to: (1) find reason to believe that THE CANDIDATE BILLY DAVIS INC., and DAVIS, BILLY in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

AF#3318 Decided by a vote of 4-0 to: (1) find reason to believe that THE DEMOCRATIC COALITION, and LUCIA, FRANCESCA N in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

Attest:

April 3, 2017
Date


Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 2017

Kenneth G. Bellevue, in official capacity as Treasurer
Friends of Pam Tucker
P.O. Box 1228
Portsmouth, NH 03802

C00610808
AF#: 3298

Dear Mr. Bellevue:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year-End Report of Receipts and Disbursements every calendar year. This report, covering the period October 1, 2016 through December 31, 2016, shall be filed no later than January 31, 2017. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On April 3, 2017, the FEC found that there is reason to believe ("RTB") that Friends of Pam Tucker and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before January 31, 2017. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$3,751. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$3,751 is due within forty (40) days of the finding, or by May 13, 2017, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$66,943
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

- 1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**
If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street,

NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 13, 2017. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Friends of Pam Tucker and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Steven T. Walther
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$3,751 for the 2016 Year-End Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Friends of Pam Tucker

FEC ID#: C00610808

AF#: 3298

PAYMENT DUE DATE: May 13, 2017

PAYMENT AMOUNT DUE: \$3,751

May 9, 2017

AF# 3298

This report has since been filed
as a Final Report with \$ money
remaining in the committee Report.

Since The candidate decided not to Run
and Returned all contributions to donors,
\$ assets remained & \$ fine is therefore due
since \$ assets remained.

Ken Bellevue
Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 2017

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 3298 – Friends of Pam Tucker and Kenneth G. Bellevue, in his official capacity as Treasurer (C00610808)

Summary of Recommendation

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$326 civil money penalty.

Reason-to-Believe Background

The 2016 Year-End Report was due on January 31, 2017. On May 9, 2017, the respondents filed a Termination Report which included the 2016 Year-End coverage period of October 1, 2016 through December 31, 2016. The 2016 Year-End Report is not election sensitive and the relevant activity was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On April 3, 2017, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2016 Year-End Report and made a preliminary determination that the civil money penalty was \$3,751 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on April 5, 2017 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee shall file a report for the quarter ending December 31 no later than January 31 of the following calendar year. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(a)(1)(i). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Summary of Respondents' Challenge

On May 15, 2017, the Commission received the written response ("challenge") from the Treasurer. The Treasurer states that the Candidate decided not to participate in the election and subsequently returned all contributions. He states the Committee's recently filed report shows it has no remaining assets. Therefore, no penalty is due.

Analysis

The 2016 Year-End Report covering October 1, 2016 through December 31, 2016 was due on January 31, 2017. On January 25, 2017, the Commission's Electronic Filing Office ("EFO") sent an email to ken.bellevue@gmail.com and pam@pamfornewhampshire.com reminding the Committee of the 2016 Year-End Report filing deadline. On February 1, 2017, EFO sent another email to the same email addresses notifying the Committee of its failure to electronically file the report. On February 16, 2017, RAD sent a non-filer notification via email to pam@pamfornewhampshire.com, the email address listed on the Committee's Statement of Organization.

The respondents first contacted the Commission regarding the 2016 Year-End Report on April 28, 2017. According to RAD telecoms (written records of telephone conversations), the Treasurer acknowledged they had not yet filed the report and stated he would like to submit it as a termination report. The Treasurer also indicated he was having issues with his computer, which were likely due to a virus. The RAD Analyst gave the Treasurer instructions on how to file the termination report once his computer issues were resolved. On May 9, 2017, the Committee electronically filed a Termination Report covering the 2016 Year-End reporting period.

The Reviewing Officer recognizes the Committee is inactive; however, a committee's intent to terminate and amount of cash on hand are not considered. While not specifically raised in the respondents' challenge, the Reviewing Officer also notes that committee computer failure is included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. The respondents' challenge fails to adequately address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a).

At the time of the RTB finding, the Commission used an estimated level of activity (\$66,943) to calculate the penalty because the 2016 Year-End Report had not yet been filed. 11 C.F.R. § 111.43(d)(2)(i). On May 9, 2017, the Committee filed a Termination Report to include the 2016 Year-End reporting period. The report discloses \$0 in total receipts and \$590 in total disbursements¹ during the 2016 Year-End reporting period. Therefore, the actual level of activity of the 2016 Year-End Report is \$590. Using the schedule of penalties at 11 C.F.R. § 111.43(a) for the level of activity bracket of \$1 - \$4,999.99, the civil money penalty is $\$326 \times [1 + (.25 \times 0 \text{ previous violations})]$ or \$326. Therefore, the Reviewing Officer recommends

¹ Contribution refunds are considered a category of disbursements. 11 C.F.R. § 104.3(b)(2)(v).

that the Commission assess a \$326 civil money penalty (reduced from the RTB civil money penalty of \$3,751).

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3298 involving Friends of Pam Tucker and Kenneth G. Bellevue, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3298 that Friends of Pam Tucker and Kenneth G. Bellevue, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$326 civil money penalty (reduced from the RTB civil money penalty of \$3,751); and
3. Send the appropriate letter.

Attachments

- Attachment 1 –
- Attachment 2 –
- Attachment 3 – Declaration from RAD
- Attachment 4 – Declaration from OAR

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to FRIENDS OF PAM TUCKER:
 - A) Termination Denial Letter, dated May 23, 2017, referencing the Termination Report covering October 1, 2016 through May 10, 2017 (sent via regular mail to the address of record);
 - B) Non-Filer Letter, dated February 16, 2017, referencing the 2016 Year-End Report (sent via electronic mail to: pam@pamfornewhampshire.com);
 - C) Reason-to-Believe Letter, dated April 5, 2017, referencing the 2016 Year-End Report (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find that FRIENDS OF PAM TUCKER filed a Termination Report, covering October 1, 2016 through May 10, 2017 with the Commission on May 9, 2017.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 25th day of May, 2017.

Kristin Roser KR

Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 23, 2017

Kenneth G. Bellevue, Treasurer
Friends of Pam Tucker
P.O. Box 1228
Portsmouth, NH 03802

Dear Treasurer:

On May 9, 2017, you filed a report requesting that the Federal Election Commission permit Friends of Pam Tucker (C00610808) to terminate pursuant to 52 U.S.C. § 30103(d) and 11 CFR § 102.3 of the Commission's Regulations. Because of an administrative fines matter involving your committee, your termination request has been denied.

Your committee must continue to file all required reports with the Commission. You will be notified when your request to terminate has been granted and your committee is no longer required to file reports with the Commission. If you have any questions regarding this matter, please do not hesitate to contact Aimee Wechsler on our toll free number at (800) 424-9530. Her local number is (202) 694-1194.

Sincerely,

Debbie Chacona

Debbie Chacona
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

February 16, 2017

KENNETH G. BELLEVUE, TREASURER
FRIENDS OF PAM TUCKER
PO BOX 1228
PORTSMOUTH, NH 03802-1228

IDENTIFICATION NUMBER: C00610808

REFERENCE: YEAR-END REPORT (10/01/2016 - 12/31/2016)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately. The report must be filed with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463 for House candidates, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 (if sent via overnight delivery service) or Senate Office of Public Records, P.O. Box 77578, Washington, DC 20013-7578 (if sent via USPS) for Senate Candidates. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

FRIENDS OF PAM TUCKER

Page 2 of 2

If you have any questions regarding this matter, please contact Aimee Wechsler at our toll-free number (800)424-9530. The analyst's direct number is (202)694-1194.

Sincerely,

Debbie Chacona

Deborah Chacona
Assistant Staff Director
Reports Analysis Division

250

1-800-424-9530

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A principal campaign committee shall file a report for the period ending December 31 no later than January 31 of the following calendar year. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on January 31, 2017 for the 2016 Year-End Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Cover Page, Summary Page, Post-Election Detailed Summary Pages, and Schedule B of the Termination Report filed by Friends of Pam Tucker and Kenneth G. Bellevue, in his official capacity as Treasurer. The report includes the coverage period of October 1, 2016 through May 10, 2017 and was electronically filed on May 9, 2017.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 31st day of May, 2017.

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

Image# 201705099053510464

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

Friends of Pam Tucker

ADDRESS (number and street)

P.O. Box 1228

Check if different
than previously
reported. (ACC)

Portsmouth

NH

03802

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

C C00610808

3. IS THIS
REPORTNEW
(N) ORAMENDED
(A)

STATE ▼ DISTRICT

NH

01

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

X Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M / D D / Y Y Y Y

in the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M / D D / Y Y Y Y

in the
State of

5. Covering Period

M M / D D / Y Y Y Y
10 01 2016

through

M M / D D / Y Y Y Y
05 10 2017

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Bellevue, Kenneth, G.,

Type or Print Name of Treasurer

Signature of Treasurer

Bellevue, Kenneth, G.,

[Electronically Filed]

Date

M M / D D / Y Y Y Y
05 09 2017

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

Office
Use
Only**FEC FORM 3**
(Revised 05/2016)

SUMMARY PAGE of Receipts and Disbursements

FEC Form 3 (Revised 05/2016)

PAGE 2 / 8

Write or Type Committee Name
Friends of Pam Tucker

Report Covering the Period:

From:

M M / D D / Y Y Y Y
10 01 2016

To:

M M / D D / Y Y Y Y
05 10 2017

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	0.00	75710.55
(b) Total Contribution Refunds (from Line 20(d))	590.29	73795.29
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	-590.29	1915.26
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	0.00	26915.26
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	0.00	26915.26
8. Cash on Hand at Close of Reporting Period (from Line 27)	0.00	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	25000.00	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

POST-ELECTION DETAILED SUMMARY PAGE Report of Receipts and Disbursements

FEC Form 3 (Revised 07/05)

PAGE 3 / 8

- If the candidate participated in the general election, use this form for the 30-day Post-General report.
- If the candidate did NOT participate in the general election, use this form for the Year-end report covering through December 31 of the election year (due on January 31).

This form is used in lieu of filling out Line Numbers 6 through 7 on Page 2 (Summary Page) and Pages 3 and 4 (the Detailed Summary Page) for the last report filed by a candidate during the current election cycle.

Write or Type Committee Name

Friends of Pam Tucker

Report Covering the Period: From: MM / DD / YYYY 10 / 01 / 2016 To: MM / DD / YYYY 05 / 10 / 2017

I. RECEIPTS

COLUMN A
Total this Period

COLUMN B
Election Cycle Total as of
MM / DD / YYYY
12 / 31 / 2016
(date of general election)

COLUMN C
Total for
MM / DD / YYYY
01 / 01 / 2017
(date after general election)

11. CONTRIBUTIONS

(other than loans) FROM:

(a) Individuals/Persons Other than Political Committees

(i) Itemized (use Schedule A)

through

MM / DD / YYYY
05 / 10 / 2017
(last day of reporting period)

0.00

66020.00

0.00

(ii) Unitemized

0.00

7690.55

0.00

(iii) Total of contributions from individuals

0.00

73710.55

0.00

(b) Political Party Committees

0.00

0.00

0.00

(c) Other Political Committees

0.00

0.00

0.00

POST-ELECTION DETAILED SUMMARY PAGE**Report of Receipts and Disbursements**

FEC Form 3 (Revised 1/01)

PAGE 4 / 8

COLUMN A Total this Period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * (date after general election) through * (last day of reporting period) (* See page 5 for dates)
(d) The Candidate		
0.00	2000.00	0.00
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c) and (d))		
0.00	75710.55	0.00
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		
0.00	0.00	0.00
13. LOANS:		
(a) Made or Guaranteed by the Candidate		
0.00	25000.00	0.00
(b) All Other Loans		
0.00	0.00	0.00
(c) TOTAL LOANS (add Lines 13(a) and (b))		
0.00	25000.00	0.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, rebates, etc.)		
0.00	0.00	0.00
15. OTHER RECEIPTS (Dividends, Interest, etc.)		
0.00	0.00	0.00
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)		
0.00	100710.55	0.00

POST-ELECTION DETAILED SUMMARY PAGE

Report of Receipts and Disbursements

FEC Form 3 (Revised 1/01)

PAGE 5 / 8

Write or Type Committee Name

Friends of Pam Tucker

Report Covering the Period:

From:

MM / DD / YYYY
10 / 01 / 2016

To:

MM / DD / YYYY
05 / 10 / 2017**II. DISBURSEMENTS**

COLUMN A Total this Period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * (date after general election) through * (last day of reporting period) (* See page 5 for dates)
17. OPERATING EXPENDITURES		
0.00	26915.26	0.00
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES		
0.00	0.00	0.00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate		
0.00	0.00	0.00
(b) Of All Other Loans		
0.00	0.00	0.00
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and 19(b))		
0.00	0.00	0.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
590.29	73795.29	0.00
(b) Political Party Committees		
0.00	0.00	0.00

POST-ELECTION DETAILED SUMMARY PAGE

Report of Receipts and Disbursements

FEC Form 3 (Revised 1/01)

PAGE 6 / 8

COLUMN A Total this Period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * (date after general election) through * (last day of reporting period) (* See page 5 for dates)
(c) Other Political Committees (such as PACs)		
0.00	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b) and (c))		
590.29	73795.29	0.00
21. OTHER DISBURSEMENTS		
0.00	0.00	0.00
22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d) and 21)		
590.29	100710.55	0.00
III. NET CONTRIBUTIONS (OTHER THAN LOANS)		
(Note: Substitute in lieu of Line #6 of Summary Page for this report only; subtract Line 20(d) from Line 11(e))		
-590.29	1915.26	0.00
IV. NET OPERATING EXPENDITURES		
(Note: Substitute in lieu of Line #7 of Summary Page for this report only; subtract Line 14 from Line 17)		
0.00	26915.26	0.00
V. CASH SUMMARY		
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....		590.29
24. TOTAL RECIEPTS THIS PERIOD (from Line 16).....		0.00
25. SUBTOTAL (add Line 23 and Line 24).....		590.29
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....		590.29
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25)		0.00

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary Page.FOR LINE NUMBER:
(check only one)

PAGE 7 OF 8

<input type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input checked="" type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Friends of Pam Tucker

Full Name (Last, First, Middle Initial)

A. Tucker, Pamela, Z., ,

Mailing Address P.O. Box 1228

City

Portsmouth

State

NH

Zip Code

03802

Purpose of Disbursement

010

Category/
Type

Candidate Name

Friends of Pam Tucker

Office Sought:

☒

House

☐

Senate

☐

President

Disbursement For: 2016

☒

Primary

☐

General

☐

Other (specify) ▼

State: NH

District: 01

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
12			05			2016			

FEC Identification Number

C C00610808

Amount of Each Disbursement this Period

590.29

Transaction ID : SB20A.4641

☐ Memo Item

B.

Mailing Address

City

State

Zip Code

Purpose of Disbursement

Category/
Type

Candidate Name

Office Sought:

☐

House

☐

Senate

☐

President

Disbursement For:

☐

Primary

☐

General

☐

Other (specify) ▼

State:

District:

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
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FEC Identification Number

C

Amount of Each Disbursement this Period

☐ Memo Item

C.

Mailing Address

City

State

Zip Code

Purpose of Disbursement

Category/
Type

Candidate Name

Office Sought:

☐

House

☐

Senate

☐

President

Disbursement For:

☐

Primary

☐

General

☐

Other (specify) ▼

State:

District:

Date of Disbursement

M	M	/	D	D	/	Y	Y	Y	Y
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FEC Identification Number

C

Amount of Each Disbursement this Period

☐ Memo Item

SUBTOTAL of Disbursements This Page (optional).....▶

590.29

TOTAL This Period (last page this line number only).....▶

590.29



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463



RECEIVED
FEDERAL ELECTION COMMISSION
SECTION 501

2017 NOV 15 AM 11:08

SENSITIVE

November 15, 2017

MEMORANDUM

To: The Commission

Through: Alec Palmer *alt for*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3298 – Friends of Pam Tucker and Kenneth G. Bellevue, in his official capacity as Treasurer (C00610808)

On April 3, 2017, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2016 Year-End Report and made a preliminary determination that the civil money penalty was \$3,751 based on the schedule of penalties at 11 C.F.R. § 111.43.

On May 15, 2017, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated May 31, 2017 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$326 civil money penalty, reduced from the RTB civil money penalty of \$3,751.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). To date, a response has not been received.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3298 involving Friends of Pam Tucker and Kenneth G. Bellevue, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3298 that Friends of Pam Tucker and Kenneth G. Bellevue, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$326 civil money penalty (reduced from the RTB civil money penalty of \$3,751); and
3. Send the appropriate letter.

2025-11-10 10:00:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3298
Final Determination Recommendation:)
Friends of Pam Tucker and Kenneth G.)
Bellevue, in his official capacity as)
Treasurer (C00610808))

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election
Commission, do hereby certify that on November 29, 2017, the Commission
decided by a vote of 5-0 to take the following actions in AF 3298:

1. Adopt the Reviewing Officer recommendation for AF# 3298
involving Friends of Pam Tucker and Kenneth G. Bellevue, in his
official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 3298 that Friends of Pam Tucker
and Kenneth G. Bellevue, in his official capacity as Treasurer,
violated 52 U.S.C. § 30104(a) and assess a \$326 civil money penalty
(reduced from the RTB civil money penalty of \$3,751).
3. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub
voted affirmatively for the decision.

Attest:

November 30, 2017
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 2017

Kenneth G. Bellevue, Treasurer
Friends of Pam Tucker
P.O. Box 1228
Portsmouth, NH 03802

C00610808
AF#: 3298

Dear Mr. Bellevue:

On April 3, 2017, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Friends of Pam Tucker and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2016 Year-End Report. The Commission also made a preliminary determination that the civil money penalty was \$3,751 based on the schedule of penalties at 11 C.F.R. § 111.43. On May 15, 2017, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission reduce the RTB civil money penalty because it was calculated using an estimated level of activity, make a final determination that Friends of Pam Tucker and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the actual level of activity disclosed on the 2016 Year-End Report filed May 9, 2017 (\$590), assess a civil money penalty in the amount of \$326 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on May 31, 2017.

On November 29, 2017, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Friends of Pam Tucker and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on the 2016 Year-End Report (\$590), assessed a civil money penalty in the amount of \$326 (reduced from the RTB civil money penalty of \$3,751). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual rather than the estimated level of activity was used. A copy of the Final Determination Recommendation is attached.

At this juncture, the following courses of action are available to you:

1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Steven T. Walther
Chairman

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$326 for the 2016 Year-End Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Friends of Pam Tucker

FEC ID#: C00610808

AF#: 3298

PAYMENT AMOUNT DUE: \$326

